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Attorney Docket No. 2003536.130US1

⌀ REMARKS

I.   Status of the claims

By the present Amendment claims 1, 9 and 12, have been amended. Claim 28 has also been amended to fix a typographical error. New claims 30-39 have been added. Accordingly, claims 1-7 and 9-39 are now pending in the present application.

II.   Art Rejections

A.   Rejection of claims 1, 7, 9-13, 18, 19, and 22-28 as obvious in view of Luchs and Bowman-Amuah

Claims 1, 7, 9-13, 18, 19, and 22-28 are rejected under 35 U.S.C. § 103(b) as being obvious in view of U.S. Patent No. 4,831,526 to Luchs et al. and U.S. Patent No. 6,615,253 to Bowman-Amuah. This rejection is respectfully traversed.

Claims 1, 9, and 12 have been amended to recite "an insurance data processing application" to make clear that an application is executing the web-based graphical interface.

Claim 1 recites that when "the request has no authorization" the system provides "an option to refer the legacy insurance application to a second used that has the authorization." Luchs fails to teach such a feature, and Bowman-Amuah does not make up for the deficiencies of Luchs. This portion of claim 1 relates to authorization for accessing a legacy application. Although portions of Luchs discuss authorization, for example, Col. 6, lines 13-18 (discussing logging onto the system), Col. 6, lines 65-67 (after logging in there is access to data), and Col. 7, lines 5-25 (showing the different access rights of different types of accounts), these teachings have nothing to do with referring the legacy insurance application to a second user. Vice versa, the portions cited by the

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Examiner having to do with saving data for later review and error checking and argued as teaching referrals, have nothing to do with authorization of a user.

This is consistent with the teachings of Luchs, which directly states what happens when authorization is denied; stating "If the user is not authorized to enter, the system rejects his entry, at 44. If authorization is verified, the central processor determines, at 46, which level of authority to which the user is entitled." (Col. 15, lines 29-32). If the user is not authorized then he is simply rejected, and the process ends. This is shown in Figure 2A where block 44 is labeled "GOOD-BYE". There is no mention of an option to be referred to a second user who has authorization to access the system as recited in claim 1. Accordingly, the Examiner is respectfully requested to withdraw the rejection of claim 1 and corresponding dependent claim 7.

Claim 9 recites "displaying a billing screen having a first grid and a second grid." Luchs does not teach or suggest a billing screen with two grids, let alone a grid for a downpayment premium for collecting and a second grid for a downpayment premium for the umbrella insurance policy. Bowman-Amuah does not make up for the deficiencies of Luchs. None of the figures in Luchs show a display screen with two grids. For example, Figure 10E, which Luchs describes as being used "to obtain particular value parameters used to determine premium information" (Col. 23, lines 55-57) is not even arranged as a grid, but as a list of questions. A list in no ways performs the same function as a grid in substantially the same way. A one dimensional list is categorically different in kind than a two dimensional grid. Therefore, the Examiner is respectfully requested to withdraw this rejection and the corresponding rejections of claims 10 and 11.

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Regarding claim 12, Luchs does not teach or suggest two levels of authorization for the same user, and Bowman-Amuah does not make up for the deficiencies of Luchs. Luchs states that after logging on, a user has access to data and to transactions specific to that user. (Col. 6, lines 65-67). Luchs states that "an agent may choose from seven (7) selected functions" (Col. 15 lines 5-6), and that "if the user accesses underwriter level 50, there is provided an underwriting decision step 56 to determine the underwriting function to be provided. This underwriting function is also detailed below and indicated generally at 57." (Col. 15, lines 41-45). This describes that in system of Luchs, the functions that are displayed to a user are limited by their logon. An agent user might have options A, B, and C available to them, while and underwriter user might have options A, B, C, and D available to them. It would make no sense to then also display functions that cannot be accessed by the user. This is in contrast to the present invention where in some embodiments, after logging onto the system, "To access the host insurance application, the user must have another ID and password for each application." (Specification page 18, lines 1-5). Therefore, the Examiner is respectfully requested to withdraw the rejection of claim 12 and corresponding dependent claims 13, 29, 18, 19, and 22-28.

B.   Rejection of claims 2, 15, and 16 as obvious in view of Luchs, Bowman-Amuah, and Bosco

Claims 2,15 and 16 are rejected under 35 U.S.C. § 103(b) as obvious in view of U.S. Patent No. 4,831,526 to Luchs et al., U.S. Patent No 6,615,253 to Bowman-Amuah, and U.S. Patent No. 5,191,522 to Bosco. This rejection is respectfully traversed.

Regarding claim 2, Bosco does refer to a mainframe system, but not in terms of a legacy application system, instead as a system for hosting the application to which terminals are connected.

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Bosco states "These integrated workstations are typically dumb terminals or personal computers which are networked to the mainframe and minicomputers of the integrated system." This describes the mainframe and minicomputers of the system of Bosco as being an integrated system. This is completely different from the present invention's client server focus and interface to a legacy system. In fact, Bosco teaches away from a client server architecture, instead recommending a fully integrated system with dumb terminals. See Col. 2, lines 5-7 ("Accordingly, it is an object of this invention to provide a fully integrated information storage, processing and reporting system which will function as a single respository for sales, underwriting, actuarial and management information, for an enterprise and as a single source for processing and reporting it"). Therefore, one of ordinary skill in the art would not consider Bosco in the same field as the current invention, and would not be motivated to combine it with Luchs and Bowman-Amuah. Accordingly, the Examiner is respectfully requested to withdraw this rejection, and the rejection of claims 15 and 16.

C.   Rejection of claims 3-6, 14, and 17 as obvious in view of Luchs, Bowman-Amuah, and NetQuote.com

Claims 3-6, 14, and 17 are rejected under 35 U.S.C. § 103(b) as obvious in view of U.S. Patent No. 4,831,526 to Luchs et al., U.S. Patent No 6,615,253 to Bowman-Amuah, and the cited NetQuote.com reference. This rejection is respectfully traversed.

Regarding claim 3, the Examiner asserts an artisan would be motivated to combine the references because it would "provide consumers with an effective way to shop for insurance." An artisan working in the field of the invention would not be considering all systems that relate to shopping for insurance, especially since the invention is directed to helping agents, and not consumers. Further, the cited NetQuote.com reference mentions nothing about legacy systems, and

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is not directed to a policy issuing system. NetQuote.com offers a way for people to conveniently

request an insurance quote from multiple companies. (NetQuote.com, page 1). There is no reason

an artisan would look to such a system to determine that commercial-lines of insurance should be

integrated into a system used by agents for issuing policies. Accordingly, the Examiner is

respectfully requested to withdraw this rejection, and the rejection of claims 4-6, 14, and 17.

> D.   Rejection of claims 20 and 21 as obvious in view of Luchs, Bowman-Amuah, and
> Mayaud

Claims 20 and 21 are rejected under 35 U.S.C. § 103(b) as obvious in view of U.S. Patent

No. 4,831,526 to Luchs et al., U.S. Patent No 6,615,253 to Bowman-Amuah, and U.S. Patent

Application 2003/0144884 to Mayaud. This rejection is respectfully traversed. Because Mayaud

fails to make up for the deficiencies of Luchs and Bowman-Amuah in teaching all the elements of

claim 12, claims 20 and 21 are patentable for at least the reasons given above with response to claim

12. Accordingly, the Examiner is respectfully requested to withdraw the rejection of claims 20 and

21.

III.   New Claims

New dependent claims 30-32 have been added to further describe the legacy application

wrapper. Claim 30 recites "wherein the wrapper comprises a rule engine executing a plurality of

business rule sets." Support for this claim is found in at least page 12, lines 18-28 and page 13 line

13 to page 14 line 7. Claim 31 further defines claim 30 and recites that the wrapper also "presents a

unified web-based GUI for a plurality of legacy insurance applications." Support for this claim is

found in at least page 16, line 16 to page 17 line 17. Claim 32 further defines claim 31 and recites

that the "plurality of business rule sets are stored in an information management system." Support

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for this claim is found in at least page 13 line 13 to page 13 line 24. All of these claims are believed to be patentable in view of the prior art of record.

New dependent claims 33 and 34 have also been added. These claims are directed to the feature of a Quick Reference Locator. Support for these claims is found in at least at Page 25, line 27 to Page 26, line 22, as well as Figure 10. These claims are directed to features that improve the usability of the system, and are believed to be patentable in view of the prior art of record.

New dependent claims 35-38 have also been added. These claims are directed to the dynamic display of interface screens. Support for these claims is found in at least Page 3, lines 13-16, Page 10, lines 15-21, and Page 34, lines 19-28. All of these claims are believed to be patentable in view of the prior art of record.

New independent claim 39 has also been added incorporating some features of the newly added dependent claims.

CONCLUSION

Applicants respectfully submit that, as described above, the cited prior art does not show or suggest the combination of features recited in the claims. Applicants do not concede that the cited prior art shows any of the elements recited in the claims. However, Applicants have provided specific examples of elements in the claims that are clearly not present in the cited prior art.

Applicants strongly emphasize that one reviewing the prosecution history should not interpret any of the examples Applicants have described herein in connection with distinguishing over the prior art as limiting to those specific features in isolation. Rather, Applicants assert that it is the combination of elements recited in each of the claims, when each claim is interpreted as a whole, which is patentable. Applicants have emphasized certain features in the claims as clearly not present in the cited references, as discussed above. However, Applicants do not concede that other features in the claims are found in the prior art. Rather, for the sake of simplicity, Applicants are providing examples of why the claims described above are distinguishable over the cited prior art.

Applicants wish to clarify for the record, if necessary, that the claims have been amended to expedite prosecution. Moreover, Applicants reserve the right to pursue the original subject matter recited in the present claims in a continuation application.

Any narrowing amendments made to the claims in the present Amendment are not to be construed as a surrender of any subject matter between the original claims and the present claims; rather merely Applicants' best attempt at providing one or more definitions of what the Applicants believe to be suitable patent protection. In addition, the present claims provide the intended scope of protection that Applicants are seeking for this application. Therefore, no estoppel should be presumed, and Applicants' claims are intended to include a scope of protection under the Doctrine of Equivalents.

Further, Applicants hereby retracts any arguments and/or statements made during prosecution that were rejected by the Examiner during prosecution and/or that were unnecessary to

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obtain allowance, and only maintains the arguments that persuaded the Examiner with respect to the allowability of the patent claims, as one of ordinary skill would understand from a review of the prosecution history. That is, Applicants specifically retract statements that one of ordinary skill would recognize from reading the file history were not necessary, not used and/or were rejected by the Examiner in allowing the patent application.

For all the reasons advanced above, Applicants respectfully submit that the rejections have been overcome and should be withdrawn.

For all the reasons advanced above, Applicants respectfully submit that the Application is in condition for allowance, and that such action is earnestly solicited.

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PAGE 22/24 * RCVD AT 6/4/2007 3:33:12 PM [Eastern Daylight Time] * SVR:USPTO-EFXRF-3/8 * DNIS:2738300 * CSID:212 230 8888 * DURATION (mm-ss):07-28

Application No. 09/909,866
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Reply to Office Action of December 4, 2006

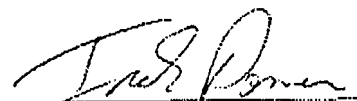Docket No.: 2003536.00130US2

AUTHORIZATION

The Commissioner is hereby authorized to charge any additional fees, which may be required for this Amendment, or credit any overpayment to Deposit Account No. 08-0219.

In the event that an Extension of Time is required, or which may be required in addition to that requested in a Petition for an Extension of Time, the Commissioner is requested to grant a Petition for an Extension of Time which is required to make this Response timely and is hereby authorized to charge any fee for such an Extension of Time or credit any overpayment for an Extension of Time to Deposit Account No. 08-0219.

Respectfully submitted,

Dated: 6/4/07

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